

## Comment on ET 01-278 SAVI Technologies RF ID Tags.

I feel that SAVI Technologies is not providing a solution that will benefit UPS or any other carrier or similar application and will cause interference to licensed service, namely the 433MHz weak signal segment of the 70cm Amateur Radio band. SAVI is proposing that their RF tags be allowed up to 2 minutes to transfer data from the tags to the polling device at a higher than normal power level. These requirements are unacceptable. How will it benefit a package carrier to delay a container or package for up to 2 minutes while it uploads its data, or even longer if it has to retransmit due to error? A relational database with only a small amount of data on the RF tag would have sufficed to meet the current rules in Part 15 operation.

SAVI's RF Tag product is flawed, an example of engineering with no prior research, it's obvious that SAVI didn't even try to work the product into the existing Part 15 rules. Proof of this is a statement by SAVI in paragraph 25 of ET 01-278 that reads "SAVI Technology, Inc. (SAVI) states that it has developed RFID tags operating at 433 MHz because unlicensed operation is permitted worldwide at that frequency." This is false, only a few countries in Europe permit unlicensed operation on 433MHz. This assumption by SAVI would not apply to ITU region 2 wherein the U.S. is located. 433MHz is licensed here, and use must comply with FCC regulations, in this case Part 15.

As a commercial interest SAVI technologies should not be afforded any preferential treatment from the FCC for a product that is obviously not designed to meet existing Part 15 requirements for use in this country. Comments from UPS and Oracle in support of SAVI's product show self-interest and as such, should not be considered. The FCC should deny this petition and any other petition to increase the power or duty cycle of Part 15 devices, as this would create significant interference to licensed services such as Amateur Radio, specifically in weak signal communications and experimentation.

I urge the FCC not to entertain SAVI's petition to modify or otherwise change Part 15 to fit SAVI's obviously flawed product into U.S. service in the 70cm Amateur Radio band. Amateur Radio must be protected so it may continue to serve the needs of the public. In light of recent events, the Amateur Radio Service may be called upon for facilitating communications for such things as disasters and homeland defense in the event of a communications emergency, to do this Amateur Radio frequencies need to be available for use without interference from unlicensed devices.

Sincerely,

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